

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST  
LITIGATION

This Document Relates To:  
*All Actions*

Civil No. 18-cv-01776-(JRT-HB)

**DECLARATION OF JAIME  
STILSON IN SUPPORT OF  
INDIANA PACKERS  
CORPORATION'S  
SUPPLEMENTAL RESPONSE TO  
PLAINTIFFS' MOTION TO  
COMPEL COMPLIANCE WITH  
SUBPOENA *DUCES TECUM***

I, Jaime Stilson, declare as follows:

1. I am a partner and Minneapolis Co-Head of the Trial group at Dorsey & Whitney LLP ("Dorsey"), and one of Indiana Packer Corporation's ("IPC's") counsel in this matter.

2. I provide this declaration in support of IPC's Supplemental Response to Plaintiffs' Motion to Compel. The information contained in this declaration is based upon my personal knowledge, and if called upon, I could testify thereto.

3. Since 2008, Dorsey has provided e-discovery and document review services to its clients through an in-house service named LegalMine. LegalMine offers an array of document review services, including collecting documents, processing documents, hosting documents on its preferred review platform Nuix, using contract attorneys to perform first-pass review under the oversight of Dorsey attorneys, and production of documents consistent with negotiated and industry standard production formats.

4. My clients have engaged LegalMine as their document vendor in dozens of matters under my oversight, and I am familiar with LegalMine's pricing and rates. Based on past experience, I believe that LegalMine rates are comparable to other similar vendor services with respect to e-discovery.

5. Currently LegalMine charges \$50/GB to process data to its document review platform. I understand that IPC would need to process approximately two terabytes of data for the nine custodians Plaintiffs requested. As a result, if IPC were to engage LegalMine to simply process IPC's data, the cost of processing alone would be \$100,000.000.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 29<sup>th</sup> day of April 2022

s/ Jaime Stilson  
Jaime Stilson